UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

*	X	
CHEVRON CORPORATION,	:	
D1-:4:66	:	
Plaintiff,	:	
V.	:	11 Civ. 0691 (LAK)
**	:	11 CIV. 0071 (LAIK)
STEVEN DONZIGER, et al.,	:	
	:	
	:	
Defendants.	X	

DECLARATION OF JOHN A. SLAVEK IN SUPPORT OF CHEVRON CORPORATION'S MOTION TO HOLD AARON MARR PAGE AND FORUM NOBIS PLLC IN CONTEMPT OF COURT FOR THEIR VIOLATION OF THE RICO AND DEFAULT JUDGMENTS

- I, JOHN A. SLAVEK, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:
- 1. I am a Managing Director of Business Intelligence and Investigations at Kroll. I have been a Certified Public Accountant for approximately 23 years. I make this declaration in support of Chevron Corporation's ("Chevron") Motion to Hold Aaron Marr Page and Forum Nobis PLLC in Contempt of Court for Their Violation of the RICO and Default Judgments.
- 2. In making this declaration, I have reviewed and relied upon document productions from eight different sources, as shown below.

#	Source	Bates # Prefix	#	# Source		Bates # Prefix	
1	TD Bank	TD Bank 000	5		Charles Schwab	SCH000	
2	Citibank	CITI-000	6		Bank of America	BANA_000	
3	American Express	AMEX 000	7		Kohn Swift & Graf	KSG00	
4	Chase Bank	CHASEPJD000	8		Torvia	AV000	

Payments to Aaron Marr Page and Forum Nobis PLLC from April 2006 to March 2019

- 3. Attached hereto as **Exhibit 1** is a chart of payments that Donziger and Ecuador case-related investors made to Aaron Marr Page and Forum Nobis PLLC from April 2006 to March 2019. These payments total \$514,472.04.
- 4. Since the RICO Judgment was entered on March 4, 2014, bank records produced to Chevron show that Donziger has paid \$107,000.00 to Page and \$67,500.00 to Forum Nobis.

Forum Nobis Transfer of \$342,045.16 to Donziger on May 8, 2018

- 5. As indicated on **Exhibit 1**, Forum Nobis PLLC sent a wire transfer from its CitiEscrow account (ending in 1194) of \$342,045.16 to Donziger's personal TD Bank account on May 8, 2018. Forum Nobis had received these funds by two cashier checks, made out to Aaron Marr Page FBO FDA, from CWP Associates' Bank of America checking account (ending in 9158), which were deposited on May 3, 2018.
- 6. On October 1, 2018, I submitted the Declaration of John A. Slavek in Support of Chevron Corporation's Motion to Hold Steven Donziger in Contempt of Court for His Failure to Comply with the RICO and Default Judgments and the April 16, 2018 Restraining Notice (the "October 1 declaration"). On May 23, 2019, the Court granted Chevron's contempt motion against Donziger and entered judgment against Donziger in the amount of \$666,476.34 (Dkt. 2209 at 69–70). In calculating this amount, the Court cited Exhibit 5-B of the October 1 declaration (*id.* at 57 & nn.184–85), which listed payments from Donziger's TD Bank accounts from January 2016 to June 30, 2018 (Dkt. 2115-1, Ex. 5-B).
- 7. Attached hereto as **Exhibit 2** is a chart that lists all of the financial transactions for which the Court entered the May 23, 2019 judgment of \$666,476.34 against Donziger.

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8. **Exhibit 2** shows that, after receiving the \$342,045.16 wire transfer from Forum Nobis on May 8, 2018, Donziger made four transfers, totaling \$31,554.71, that were reflected in the May 23, 2019 judgment of \$666,476.34. Those transfers are as follows:

Name on Account / Payor	Account No.	Pers. or Bus. Acct.	Transaction Date	Transaction Type	Paid To	Amount
Steven R. Donziger	xxxx3420	Personal	5/25/2018	АСН	Wells Fargo Home Mortgage	\$6,403.11
Steven R. Donziger	xxxx3420	Personal	6/4/2018	ACH	TD Bank Credit Card	\$3,620.43
Steven Donziger	xxxx8174	Business	6/11/2018	Wire Transfer	Laura Miller	\$15,000.00
Steven R. Donziger	xxxx3420	Personal	6/12/2018	АСН	Wells Fargo Home Mortgage	\$6,531.17
					Total	\$31,554.71

Executed on this 28th day of August, 2019 at New York, New York.

John A. Slavek